



PCEF-POL-005

# Conflicts of Interest Policy

Premier Choice Energy Fund Ltd

Version	1.0	Effective Date	May 2026
Next Review	May 2027	Classification	Controlled Document
Owner	Compliance & Risk	Approved by	Board of Directors

## 1. Purpose

This Policy sets out the framework by which Premier Choice Energy Fund Ltd identifies, manages, monitors, and discloses conflicts of interest, in accordance with FCA SYSC 10 and the UK AIFM Regulations.

A conflict of interest arises where the interests of PCEF, its employees, or related parties may conflict with the interests of the Fund or its investors. Effective management of conflicts is essential to maintaining investor trust and regulatory compliance.

## 2. Types of Conflicts Identified

PCEF has identified the following principal types of conflict:

- Investment conflicts: financial interests in potential investments that may influence decisions
- Personal account dealing: employees seeking personal benefit from information obtained professionally
- Remuneration conflicts: incentive structures creating bias in investment recommendations
- Related party transactions: Fund transacting with entities connected to investment team or Board
- Soft commission arrangements: research or services from brokers influencing execution decisions
- Board and advisory conflicts: directors or advisers holding positions in competing organisations

## 3. Management Procedures

PCEF manages conflicts through the following procedures:

- Conflicts Register maintained by the Compliance function and reviewed quarterly
- All employees required to disclose actual and potential conflicts upon joining and as they arise
- Investment decisions involving potential conflicts require prior Compliance Officer approval
- Chinese walls maintained between teams where information barriers are required



- Related party transactions disclosed to investors in the Fund's annual report

## 4. Disclosure to Investors

Where a conflict cannot be adequately managed by the procedures above, it will be disclosed to investors in a timely manner via periodic investor reports or, where urgent, by direct communication to the investor advisory committee.

## 5. Governance

The Compliance function monitors this Policy and reports to the Board annually on conflicts identified and managed during the year. All employees receive training on conflicts identification and management upon joining and annually thereafter.

### AUTHORISATION

Role	Name	Signature	Date
Chief Executive Officer	_____	_____	May 2026
Chief Compliance Officer	_____	_____	May 2026
Board Chairman	_____	_____	May 2026

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